

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:) Chapter 9
)
CITY OF DETROIT, MICHIGAN,) Case No. 13-53846
)
Debtor.) Hon. Steven W. Rhodes
)
)

**CREDITOR AFSCME COUNCIL 25's SECOND SUPPLEMENTAL
SUBMISSION IN SUPPORT OF PROOF OF CLAIM 2958 PURSUANT TO
SECTIONS 105 AND 502(b) OF THE BANKRUPTCY CODE
3007 AND LOCAL RULE 3007-1**

NOW COMES Creditor, AFSCME Council 25, by and through its attorneys, with its Second Supplemental Submission in Support of Proof of Claim 2958, and states as follows:

AFSCME attaches the Proposed Ordinance to Amend Chapter 47 of the 1984 Detroit City Code, promulgated by the City on November 8, 2011 (Exhibit A). The Notice attaches the changes to the Code which the City made November 30, 2011. The pertinent section is Section 47-2-18, entitled Method of Financing, which includes paragraph (g), entitled Income Fund, where the ordinance revision eliminated the discretion of the Board to "transfer[]" "excess" funds beyond that needed "to cover current charges to the fund".

As the Court evaluates the merits of the City's Supplemental Objection, filed October 16, 2014, Creditor again requests discovery followed by an evidentiary hearing, and all other rights of Federal Rule of Bankruptcy Procedure, Rule 9014.

I. CONCLUSION

WHEREFORE, the Coalition of Detroit Unions respectfully requests that this Honorable Court overrule the City of Detroit's Objections.

Dated: October 17, 2014

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